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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

NOV 16 1995

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In the Matter of )  
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Toll-Free Service Access Codes )  
)

CC Docket No. 95-155

**REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION**

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## SUMMARY

MCI reiterates its support for advance reservation prior to opening of the 888 code, a 50 percent trigger point for the planning of implementation beyond the 888 code, a hold on 800 vanity numbers until they can be resolved after the code is opened, and the collection of additional information and release in aggregate form.

MCI does not support a requirement for an affirmative request from a subscriber before reserving a number, or a requirement for an escrow deposit when reserving or assigning a number. MCI does not support reducing the time periods during which a number can be held in certain statuses, or further restricting the quantity limitation on reserved numbers.

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**REPLY COMMENTS OF**  
**MCI TELECOMMUNICATIONS CORPORATION**

MCI Telecommunications Corporation and its affiliated companies (MCI) respectfully submit these reply comments in the captioned proceeding.

I. EFFICIENT USE OF TOLL-FREE NUMBERS

A. THE COMMISSION SHOULD NOT REQUIRE A RESPONSIBLE ORGANIZATION TO OBTAIN AN AFFIRMATIVE REQUEST BEFORE RESERVING A NUMBER

Some commenters support a requirement that the toll-free Responsible Organization (RespOrg) obtain an affirmative request from a customer prior to reserving a number, although most agree that no written authorization should be imposed. As stated in its initial comments, MCI believes that the Commission should not require a RespOrg to keep specific records concerning requests for number reservations. As AT&T Corp. notes (at 6-7), customer requests for number reservations are often made over the telephone in the service ordering process. Customers that request reservation and subsequently do not request service may not be evidenced in any sales record. MCI agrees with Sprint Corporation (at 2-3) that a written letter of

authorization should not be required because such a requirement would be more burdensome than the requirement that a carrier obtain authorization to change a customer's primary interexchange carrier designation.

In the event the Commission concludes that a written commitment would better serve the public interest, however, MCI agrees with those commenters who recommend that a subscriber's request for a toll-free number could be shown by notes kept during the sales process, or a signed sales contract with the customer, or an undisputed customer payment of service charges for two months (Sprint, Scherers Communications Group, Inc.). With respect to toll-free numbers requested by the customer as part of a "package" of services, MCI reiterates that the customer's request for such an offering should be sufficient to signify interest in the toll-free number. Moreover, when a RespOrg obtains numbers for a service provider and not end users, the service provider, rather than the RespOrg, should bear the responsibility to obtain and maintain any records of requests.

**B. THE COMMISSION SHOULD NOT REQUIRE AN ESCROW  
DEPOSIT FOR REQUESTS TO RESERVE NUMBERS**

Commenters generally oppose the requirement of an escrow deposit for each toll-free number placed in reserve status. However, the Ameritech Operating Companies (at 8) suggest that any RespOrg with more than 1 percent of all

toll-free numbers should pay into an escrow account \$50 each time it reserves or assigns a number. This proposal should be rejected. As MCI stated in its initial comments, enforcement actions (as authorized by Sections 312, 403, 502, and 503 of the Communications Act, 47 U.S.C. §§ 312, 403, 502, and 503) would be more effective in deterring any abuse that arises than would imposition of fees for reservation, and the cumbersome processes they would entail.

C. THE COMMISSION SHOULD ADOPT THE TIME PERIODS FOR NUMBERS HELD IN CERTAIN STATUSES AS ESTABLISHED IN INDUSTRY GUIDELINES

Many commenters agree with MCI that the time periods during which numbers can be held in certain statuses should be adopted as established in the industry guidelines.<sup>1</sup> Some argue for reduction in certain periods but not others. Clearly, there is no general consensus as to the reduction of particular time periods. MCI recommends that the Commission take the prudent course and adopt the time periods set out in the guidelines. These rules could be revised at a later date, if and when change becomes necessary. MCI supports AT&T's suggestion (at 5) that the FCC adopt as rules only those guidelines needed to facilitate enforcement actions; others should remain as industry guidelines so they can be modified quickly to adapt

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<sup>1</sup> Industry Guidelines for 800 Number Administration, dated June 8, 1995.

to changes in the marketplace.

D. THE COMMISSION SHOULD NOT DECREASE THE QUANTITY  
LIMITATION FOR RESERVED NUMBERS

Many commenters support the current limit on reserved numbers of the greater of 1,000 numbers or 15 percent of working numbers. AT&T and Alliance for Telecommunication Industry Solutions favor reducing the limit to 8 percent of the RespOrg's working numbers. MCI restates its support for the 15-percent limit established in the industry guidelines. MCI believes that a lower percentage limitation would unnecessarily restrict RespOrgs during times of heavy consumer demand. It also could restrict the rate of growth for smaller RespOrgs. One party (NextLink), suggests that only a flat quantity limit should be used. This proposal should be rejected as it would give a disproportionately high quantity of numbers to smaller RespOrgs. The guidelines allow for a flat quantity and a percentage amount in an effort to fairly treat both large and small RespOrgs.

E. THE COMMISSION SHOULD ENCOURAGE, BUT NOT MANDATE,  
THE USE OF PERSONAL IDENTIFICATION NUMBERS

The overwhelming majority of commenters agree with MCI that the Commission should encourage, but not mandate, the use of Personal Identification Numbers (PINs) in conjunction with toll-free assignments. Many are concerned about the inability of customers to port these shared numbers, and



others express concerns about the competitive impact of requiring PINs.

## II. IMPLEMENTATION OF THE 888 TOLL-FREE CODE

As a general matter, MCI requests clarity in any requirements adopted by the Commission. Especially given the short implementation time for 888, clear requirements would assist greatly in achieving consistency among RespOrgs in carrying out the new requirements.

Pacific Telesis (at 2) states that the Commission should not take any action on implementing additional toll-free numbers until it resolves the audit process undertaken with respect to the depletion of 800 numbers. MCI disagrees, and recommends that the FCC not jeopardize 888 implementation by holding the industry's efforts in abeyance until a decision is released on the audit.

### A. THE COMMISSION SHOULD CODIFY PROCEDURES FOR THE RESERVATION OF TOLL-FREE NUMBERS

Commenters overwhelmingly agree with MCI that the first-come, first-served allocation principle should continue to be used for number reservations. A few parties favor a lottery approach to resolve competing requests for the same number. MCI does not support such an approach to number reservation. As MCI stated in its initial comments, it is highly improbable that two RespOrgs will request the same number at the exact same time, thereby making a lottery

essential as a fall-back allocation mechanism. In practice, the lottery system would require the database administrator to hold the number request for a period of time before reserving it for the requesting RespOrg. This makes no sense for the subscriber who needs a number. The subscriber who first expresses a need for the number should have the opportunity to have a RespOrg reserve that number. This is how the system operates under the current procedures and, MCI submits, that system best reflects the public interest.

B. THE COMMISSION SHOULD ALLOW NUMBER RESERVATION  
PRIOR TO OPENING OF THE 888 RESOURCE

Many commenters support allowing for a period in advance of the opening of the 888 code during which RespOrgs could reserve numbers. MCI repeats its support for an advance reservation period beginning 45 days before the code is opened for general activity. This should reduce the load on the data links that might otherwise occur because of the demand that has not been satisfied due to 800 conservation measures.

C. CLAIMED VANITY NUMBERS SHOULD BE HELD IN  
UNAVAILABLE STATUS UNTIL THEIR ASSIGNMENT CAN BE  
RESOLVED

Some commenters join MCI in supporting the approach advocated by the SMS/800 Number Administration Committee (SNAC), which recommends holding the potential vanity numbers and resolving their assignment sometime after the

888 code is opened.

Commenters generally join MCI in opposing the proposal to use standard industrial codes because it is administratively cumbersome, not easily enforced, and otherwise unworkable. Likewise, most commenters do not support using a gateway intercept message for the same 7-digit numbers in both the 800 and 888 codes. MCI agrees that requiring use of an intercept message is not in the public interest. The message would introduce delay in the call completion, reducing the value of the numbers subject to it. It would interfere with number portability, and it would require network development to accommodate this capability, at substantial cost. Furthermore, the intercept would consume substantial system capacity, with little or no consumer benefit.

Commenters are split on the right of first refusal for holders of 800 vanity numbers, with mostly users advocating this protection and other commenters either opposing or remaining neutral. Commenters are also split on whether a fee should be charged for exercise of the right of first refusal. MCI is opposed to charging a fee for replication of the vanity number. In the event the FCC decides to charge a fee, however, MCI requests clear requirements in connection with the fee. Specifically the Commission should address whether this would be a one-time or recurring fee, whether it would be a flat or graduated fee, how soon the

RespOrg would be required to submit the fees to the fund administrator, whether the funds would be submitted to the U.S. Treasury or another organization, and how a RespOrg should handle nonpayment of the fee by a customer requesting replication.

Some commenters recommend that the Commission should allow holders to protect only the valued word or words rather than the number itself (TRA, Sprint). In other words, the new subscriber of a number would commit to not promote or market a number using the same word(s) as the holder of the vanity number. MCI believes this proposal is worth consideration by the Commission. It would protect the value of the vanity number, but would allow assignment to another subscriber. However, it would require new SMS procedures to implement and these would need to be investigated before adopting such a proposal. Also, the Commission must determine whether it has legal authority to prevent subscribers obtaining 888 numbers from using and marketing those protected words.

AT&T (at 24-25) proposes that the Commission allow each RespOrg to replicate for its customers only 15 percent of its total working numbers. MCI opposes this approach. If the Commission determines that replication is in the public interest, it should allow RespOrgs to replicate the number of each holder of a vanity 800 number that qualifies for replication. Otherwise, customers who fall beyond the

RespOrg's 15-percent barrier would be obligated to shop around for a RespOrg that could accommodate the 888 number corresponding to their 800 vanity number. Clearly, this would not be fair to either the customer or the affected RespOrg.

Finally, many commenters agree with MCI that partitioning of codes among services, allocating 800 for commercial services and other codes for other services, would be discriminatory and would offer only temporary code exhaust relief.

### III. THE COMMISSION SHOULD ADOPT A 50 PERCENT "TRIGGER" FOR THE PLANNING OF IMPLEMENTATION BEYOND 888

Most commenters agree that the Commission should establish a trigger point to indicate when the industry should begin planning for implementation of the next toll-free code. MCI supports the 50 percent trigger proposed by the Commission. Although others support points ranging from the day the new code is opened to a point when the code reaches 70 percent exhaust, there is no greater likelihood that these trigger points will allow for better planning than the FCC's proposed trigger point. In fact, the trigger points at the higher end of the exhaust timeline might not allow sufficient time for planning, giving rise to an emergency circumstance similar to that faced by the industry with 800 exhaust.

#### IV. TOLL-FREE DATABASES SHOULD BE ADMINISTERED BY A NEUTRAL ENTITY

Commenters generally support a neutral administrator for the toll-free databases. MCI supports placing the administration of toll-free numbers under the auspices of the North American Numbering Council. While the Database Services Management, Inc. (DSMI) has performed its functions well, MCI believes that the SMS should be owned and managed by an entity not affiliated with any industry segment. This would diminish the potential for anti-competitive conduct.

Under the guidance of the RBOCs and Bellcore, DSMI is inevitably influenced toward the interests of these parties when it makes decisions. Sprint (at 23) questions whether DSMI has accorded sufficient priority to SMS upgrade projects that are needed by interexchange carriers. The implementation of 8XX is a good example of an upgrade that, in MCI's view, was not given sufficiently high priority because of conflicting RBOC priorities.

Access to competitively-sensitive information is another reason to remove administration from the control of the RBOCs. Sprint and Scherers raise a recent issue of the SMS management team (SMT) requesting the list of numbers that could potentially be replicated in the 888 resource. RespOrgs requested confidential treatment of these lists and DSMI declined to guarantee such treatment because the SMT (representing mostly RBOCs) claimed it had a right to see the information. MCI agrees with Sprint that the FCC should

direct DSMI: (1) to deny the SMT access to RespOrg-specific proprietary information of this nature; and (2) to certify that it has not shared this information with the SMT.

RBOC control of the toll-free database would be a continuing issue, as it could be used to competitive advantage if and when the RBOCs begin providing long-distance service along with their local monopoly services.

#### V. MCI SUPPORTS COLLECTION OF ADDITIONAL INFORMATION AND RELEASE TO THE PUBLIC IN AGGREGATE FORM

Most commenters agree with MCI that collection of data will be beneficial, that this information should be considered confidential and proprietary, and that it should be released only as aggregated, industry data.

#### VI. CONCLUSION

MCI reiterates its support for advance reservation prior to opening of the 888 code, a 50 percent trigger point for the planning of implementation beyond the 888 code, a hold on 800 vanity numbers until they can be resolved after the code is opened, and the collection of additional information and release in aggregate form.

MCI does not support a requirement that a RespOrg obtain an affirmative, written request from a subscriber before reserving a number, or a requirement for an escrow deposit when reserving or assigning a number. MCI does not support reducing the time periods during which a number can

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Respectfully submitted,

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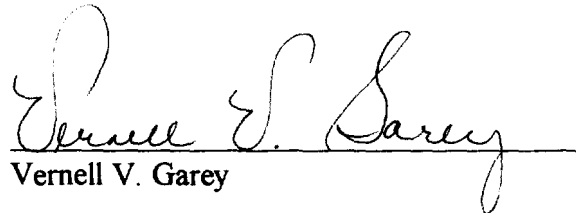
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